10.0 INSIGNIFICANT ACTIVITIES

Table 10-1 insignificant activities with no quantifiable emissions, as defined in IDAPA 58.01.01.317.

Table 10-1 Insignificant Emissions

Emission Point No.	Description	IDAPA Citation
1	2,500 gallon T-6 storage tank	58.01.01.317.b.i.(3)
2	3,000 gallon acetone storage tank	58.01.01.317.b.i.(3)
3	Oven Heaters #1 through #8 - 140,000 Btu/hr	58.01.01.317.b.i.(5)
4	Space Heaters #1 through #5 - 100,000 Btu/hr	58.01.01.317.b.i.(5)
5	518 Kit and 604 Kit – Portable Totes and Drums	58.01.01.317.a.i.(37)
NA	Buffers	58.01.01317.01.a.i.(54)

11.0 ALTERNATIVE OPERATING SCENARIO/TRADING SCENARIOS/PERMIT SHIELD

11.1 Alternative Operating Scenario/Trading Scenarios

Teton Sales does not propose alternative operating scenarios or trading scenarios.

11.2 Permit Shield

Teton Sales requests application of the permit shield to the operating permit issued from this application. Compliance with the conditions of the permit shall deem the facility compliant with all applicable requirements as of the date of permit issuance.

Teton Sales also requests that the applicability determinations of this document be made part of the operating permit. Teton Sales understands that incorporation of the applicability determinations is necessary to ensure full protection under the permit shield.

12.0 DEMONSTRATION OF COMPLIANCE WITH TOXIC STANDARDS

12.1 TAPs

Table 12.1-1 summarizes the TAP emissions and the respective EL thresholds from IDAPA 58.01.01 585 and 586. The only non-carcinogen exceeding the EL is toluene. The only carcinogen exceeding the EL is formaldehyde. Modeling was conducted for the 24-hour averaging time for the AAC evaluation and the annual averaging time for the AACC evaluation.

Table 12.1-1 TAPs Compared to the EL

NON-CARCINOGENS				
Pollutant	**Max. Hourly Emissions (lb/hr)**	**Screening Level (lb/hr)**	**Modeling? (Y/N)**	**Emissions (tons/yr)**
Ammonia	0.05	1.2	N	0.18
1,2-Ethanediol	0.04	0.846	N	0.15
Toluene	62.01	25	Y	204.62
Methyl ethyl ketone	30.66	39.3	N	101.18
Methyl Isobutyl Ketone	5.74	13.7	N	18.94
Xylene	2.97	29	N	9.81
Methanol	3.81	17.3	N	12.56
Acetone	64.76	119	N	213.72
Isopropanol	8.20	65.3	N	27.07
Ethyl benzene	0.57	21.75	N	1.88
Cumene	0.18	16.3	N	0.59
Ethyl acetate	0.04	93.3	N	0.14
2-Butoxyethanol	0.02	8	N	0.07
Isobutyl acetate	2.09	46.7	N	6.90
Butanol	0.05	47.3	N	0.16
Butyl acetate	2.76	10	N	9.10

CARCINOGENS				
Pollutant	**Max. Hourly Emissions (lb/hr)**	**Screening Level (lb/hr)**	**Modeling? (Y/N)**	**Emissions (tons/yr)**
Formaldehyde	0.01	0.00051	Y	0.04

Table 12.1-2 compares the TAP emissions to the AAC or AACC for those pollutants which exceed the emission limit. Both pollutants were below AAC and AACC concentrations.

Table 12.1-2 TAPs Compared to the AAC or AACC (for those exceeding the EL)

Non-Carcinogens			
Pollutant	**Modeled 24-hour µg/m3**	**AAC µg/m3**	**% AAC**
Toluene	16,220	18,750	86.5%
Carcinogens			
Pollutant	**Modeled Annual µg/m3**	**AACC µg/m3**	**% AACC**
Formaldehyde	1.7E-02	7.70E-02	22.1%

12.2 HAZARDOUS AIR POLLUTANTS (HAPS)

Table 12.2-1 below summarizes HAP emissions from Teton Sales. As shown in the table, Teton Sales is not a major source for HAPs.

Table 12.2-1 HAP Emissions

HAPs Inventory Pollutant	Emissions (tons/yr)
Formaldehyde	0.04
Xylene	9.8
Toluene	204.6
Methyl Ethyl Ketone (MEK)	101.2
Methyl Isobutyl Ketone (MIK)	18.9
Ethyl Benzene	1.9
Methanol	12.6
1,2-Ethylanediol	0.15
2-Butoxyethanol	0.07
Cumene	0.60
Total[a]	**350.5 when equipment runs simultaneously** **217.9 when equipment does not run simultaneously**

[a]Assumes all pieces of equipment are capable of operating simultaneously. However, \because equipment can not operate simultaneously the HAPs PTE is 217.9 tons per year. See PM-10, VOC and HAP Table in section 8.1.1, SCREEN3 and Aggregate Output Data Sheets.

Appendix A

Completeness Checklist

Prepared for:
Air Quality Permitted Facilities

By:
Idaho Division of Environmental Quality
Air Quality Permitting Bureau
Operating Permits Section

AIR QUALITY OPERATING PERMIT APPLICATION CHECKLIST

COMPLETENESS DETERMINATION CHECKLIST AND APPLICATION INDEX

Company Name _ Teton Sales Company

Location Caldwell, Idaho

Project Tier I Operating Permit Application Renewal

Reviewer Diane Puri/Daniel Heiser, JBR/Melissa Armer, JBR
Date May 4, 2005

The attached forms have been provided as a checklist and application index to ensure all the required information have been included with the air pollution source permit application. These forms shall be submitted along with the application. These checklist/index forms include the following elements of the permit application:

_ **Application Forms**
_ **Source Descriptions**
_ **Source Flow Diagrams**
_ **Plot Plans**
_ **Emission Estimate References and Documentation**
_ **Excess Emission Documentation**
_ **Ambient Air Impact Analysis**
_ **Compliance Certification Plan**

Each page of the permit application shall be numbered so that each page can be referenced individually. This will allow these checklist forms to act as the permit application table of contents.

APPLICATION FORMS

SECTION SOURCE PAGE

__4.0_____ _____Permit Application Forms_____ __pg 4-1__

_____ _____ ____
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YES NO

_ Is the application signed and dated? __y_ ___

_ Are all the forms adequately completed? _y__ ___

SOURCE DESCRIPTIONS

SOURCE PAGE

_ Section 3.0 Process Description_____ _pg 3-1___

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YES NO

_ Are the existing facilities described? _y__ ___
_ Are the modifications or new facilities described? _y__ ___
_ Are all applicable processes, materials, ventilation, and controls described? _y__ ___
_ Are all equipment referenced by specific ID name or number? _y__ ___

SOURCE FLOW DIAGRAMS

SOURCE PAGE

___Section 3.0___Process Flow Diagram – 518 Kit _____ Figure 3-1__ pg 3-4__
___Section 3.0___ Process Flow Diagra – 604 Kit_____ Figure 3-2___pg 3-5_

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YES NO

_ Are included? _y__ ___
_ Shows entire existing facility? _y__ ___
_ Shows entire future facility? _NA__ ___
_ Shows each process separately (if needed)? _y__ ___
_ Details storage, roads, transfers, and processing? __y_ ___
_ Labeling is adequate (processes and stacks identified)__y__

PLOT PLANS

SOURCE PAGE

_____Plot Plan and Ambient Air Boundry_____ __Figure 2-1_pg 2-2_
_____Location Map_____ Figure 2-2__pg 2-3__

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YES NO

_ Is included? __y_ ___
_ Shows location coordinates? _y__ ___
_ Shows plant boundaries? _y__ ___
_ Shows neighboring ownership and facilities? NA___ ___
_ Shows topography? _n__ ___
_ Scale shown or distances adequately labeled? _y__ ___
_ Shows all buildings, equipment, storage, and roads? __y_ ___
_ Is adequate for both existing and future or includes both? _y__ ___

EMISSION ESTIMATE REFERENCES AND DOCUMENTATION

SOURCE PAGE

__Section 5.0 Emission Calculations_____ _pg 5-1___

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YES NO

_ All fugitive and point sources listed? _y__ ___
_ All pollutants addressed? _y__ ___
_ Process documentation and specs included? _yes process is documented, no specs included__ ___
_ Control equipment documentation and specs included? _y__ ___
_ Emission factors documented and referenced? _y__ ___
_ Calculations and assumptions shown? _y__ ___
_ Source tests referenced (test includes processing and control device _NA__ ___
test conditions)?

EXCESS EMISSION DOCUMENTATION

SOURCE PAGE

__Section 7.0 Excess Emission Documentation_____ _pg 7-1___

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YES NO

_ All three types of excess emissions (startup, shutdown, and scheduled maintenance) covered for each source? _n__ ___
_ Calculations and documentation included? _n__ ___
_ Expected frequencies of excess emissions noted? _n__ ___
_ Justification for amounts and frequencies of excess emissions? _n__ ___
_ Procedures for minimizing excess emissions covered? _n__ ___

AMBIENT AIR IMPACT ANALYSIS
PROJECT PAGE

__Section 8.0 Ambient Air Impact Analysis_____ _pg 8-1___

Existing ambient air quality discussion including attainment status and __y__
classification of areas which may be significantly impacted.
Discussion of dispersion model use and assumptions. __y__
Dispersion model input. __y__
Dispersion model output. __y__
Discussion of ambient impacts for each pollutant. __y__
Discussion of how excessive impacts will be controlled or avoided _n___
for sources and pollutants with the potential for these.

COMPLIANCE CERTIFICATION PLAN

SOURCE PAGE

__Section 9.0 Compliance Certification Plan_____ pg 9-1___

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YES NO

_ Monitoring, recordkeeping, and reporting discussed? __y_ ___
_ Stack testing methods thoroughly documented? ___NA___
_ Discussion and documentation of process control mechanisms used to meet __y_ ___
emission limits?
_ Quality assurance/quality control discussed? __NA_ ___
_ Monitoring equipment specifications and documentation included? __y__